

THE OFFICE OF REGULATORY STAFF
DIRECT TESTIMONY
OF
ANTHONY SANDONATO
AUGUST 22, 2018



DOCKET NO. 2018-197-E

APPLICATION OF SOUTH CAROLINA ELECTRIC & GAS COMPANY FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF PEPPERHILL-SUMMERVILLE 230 kV LINE, THE WILLIAMS-PEPPERHILL 230 kV LINE SEGMENT, THE CANADYS-FABER PLACE 230 kV LINE SEGMENT, AND ASSOCIATED FACILITIES AND FOR CERTAIN LIKE FACILITY DETERMINATIONS

DIRECT TESTIMONY OF

ANTHONY SANDONATO

ON BEHALF OF

THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF

DOCKET NO. 2018-197-E

**IN RE: APPLICATION OF SOUTH CAROLINA ELECTRIC & GAS COMPANY FOR
A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC
CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION
OF THE PEPPERHILL – SUMMERVILLE 230 KV LINE, THE WILLIAMS –
PEPPERHILL 230 KV LINE SEGMENT, THE CANADYS – FABER PLACE 230 KV
LINE SEGMENT AND ASSOCIATED FACILITIES AND FOR CERTAIN LIKE
FACILITY DETERMINATIONS**

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.

A. My name is Anthony Sandonato. My business address is 1401 Main Street, Suite 900, Columbia, South Carolina 29201. I am employed by the State of South Carolina as a Regulatory Analyst in the Utility Rates and Services Division of the Office of Regulatory Staff (“ORS”).

Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I received my Bachelor of Science in Nuclear Engineering from North Carolina State University in 2011. Prior to my employment with ORS, I was employed as an analyst with a global professional, technology, and marketing service firm working with large

investor owned utilities on energy efficiency program design and implementation. I joined ORS in 2016.

Q. HAVE YOU TESTIFIED BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA (“COMMISSION”)?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide the results of ORS’s review of the Application (“Application”) of South Carolina Electric & Gas Company (“SCE&G” or “Company”) for a Certificate of Environmental Compatibility and Public Convenience and Necessity (“Certificate”) filed on June 14, 2018 to construct and operate one 230 kilovolt (“kV”) transmission line and two 230 kV line segments (“Proposed Lines”) in Berkeley and Charleston Counties, South Carolina. In addition, I discuss the Company’s request that the Commission make a “Like Facility Determination.” The Application was filed pursuant to S.C. Code Ann. § 58-33-10 et seq. (2015) (“Siting Act”) and S.C. Code Ann. Regs. 103-304 (2012).

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PROPOSED TRANSMISSION FACILITIES.

A. The first of the proposed facilities is a 230 kV transmission line extending approximately 7.8 miles from the Company’s existing Pepperhill 230/115 kV Substation (“Pepperhill Substation”) in North Charleston, South Carolina to the Company’s existing Summerville 230/115 kV Substation (“Summerville Substation”) near Summerville, South Carolina (“Pepperhill – Summerville 230 kV Line”). The proposed line would be built entirely on existing Company right-of-way (“ROW”).

1 The second of the proposed facilities is a 230 kV transmission line segment
2 extending approximately 3.7 miles from the point approximately 400 feet south of Ancrum
3 Road in Charleston County to the Pepperhill Substation (“Williams – Pepperhill 230 kV
4 Line Segment”). The proposed line segment would be built entirely on existing Company
5 ROW.

6 The third of the proposed facilities is a 230 kV transmission line segment extending
7 approximately 350 feet on existing Company ROW contiguous to the Pepperhill Substation
8 (“Canadys – Faber Place 230 kV Line Segment”).

9 The Company’s Application includes a 230 kV line terminal at the Pepperhill
10 Substation and one new 230 kV line terminal at the Summerville Substation.

11 In addition, the Company’s Application includes an approximately 3.9-mile-long
12 rebuild of the Summerville – Williams 230 kV line between Summerville and Ladson
13 Junction. Should the Commission determine that the Company’s request does not exceed
14 the criteria for a “like facilities” filing, ORS has no objection to the Company’s filing.

15 **Q. WHAT IS YOUR UNDERSTANDING OF THE NEED FOR THE PROPOSED**
16 **LINES AND ASSOCIATED FACILITIES?**

17 **A.** The Company’s Transmission Planning studies indicate possible future thermal
18 violations on the Summerville 230/115 kV Transformer #1, thermal violations on the
19 Canadys – Church Creek 230 kV Line and heavy loading on other electrical equipment.
20 These thermal violations and heavy loading of electrical equipment, which may occur as
21 early as 2020, could result in System Operating Limit violations on the electrical
22 transmission system in the southern region of SCE&G’s electrical service area.

The Company adheres to the North American Electric Reliability Corporation's ("NERC") Transmission Planning Standards, as well as its own Long Range Planning Criteria, to determine the need for new transmission facilities. By applying these standards and criteria to the electrical system, the Company determined additional support was necessary, and the Proposed Lines were the most appropriate solution. The Proposed Lines will ensure that the Company's system remains in compliance with NERC standards and its own Long Range Planning Criteria.

Q. DID THE COMPANY CONSIDER ANY ALTERNATIVES TO CONSTRUCTING THE PROPOSED TRANSMISSION FACILITIES?

A. Yes. The Company evaluated five alternatives to address the overloading of the Summerville 230/115 kV Transformer #1 and the Canadys – Church Creek 230 kV Line. These alternatives included rebuilding transmission lines, construction of new transmission lines, adding additional transformers and constructing a new transmission switching station. Ultimately, the Company determined these alternatives were either not feasible due to the alternatives not addressing all electrical loading issues, time constraints or led to negative impacts for other facilities.

Q. PLEASE DESCRIBE THE INFORMATION THE SITING ACT REQUIRES IN AN APPLICATION FOR A CERTIFICATE.

A. The Siting Act directs that an application contain a description of the location and the major utility facility(ies) to be built; a summary of any studies which have been made of the environmental impact of the facility(ies); a statement explaining the need for the facility(ies); and such other information as the applicant may consider relevant or as the Commission may require.

Q. DOES THE APPLICATION CONTAIN THIS INFORMATION?

A. Yes. A description of the facilities and their locations is presented, as well as siting and environmental reports including a description of the intended use and need for the facilities.

Q. WHAT IS THE PROBABLE ENVIRONMENTAL IMPACT OF THE TRANSMISSION LINES?

A. The Company conducted a Transmission Line Siting and Environmental Report (“Study”) to determine the environmental impact of the Proposed Lines. The Study takes into consideration the effect of the Proposed Lines on the environment, as well as, cultural, land use and scenic resources. The Study results indicate the Proposed Lines would not have a significant impact on the environment. The Study also states that impact on cultural, land use and scenic resources are also minimized by the proposed routes.

As part of the review of the Company’s application, ORS reached out to the South Carolina Department of Health and Environmental Control (“DHEC”), the South Carolina Department of Natural Resources (“DNR”) and the South Carolina Department of Parks, Recreation and Tourism (“PRT”). DHEC informed ORS on July 26, 2018 that it had no concerns with the Application and does not plan on submitting comments or testimony in the proceeding.

From its review and correspondence with DHEC, ORS concluded that the Study adequately addresses the environmental impacts of the Proposed Lines.

Q. HOW WILL THE PROPOSED LINES SERVE THE INTEREST OF SYSTEM ECONOMY AND RELIABILITY?

1 **A.** The Company indicates in its Application, as well as in testimony, the Proposed
2 Lines are the most cost-effective manner to serve the system and minimize the impacts to
3 the environment, land use, cultural resources, and aesthetics. ORS concluded that the
4 Proposed Lines will be designed to NERC standards and will enhance the reliability of
5 SCE&G's system.

6 **Q. DOES THE COMPANY PROVIDE REASONABLE ASSURANCE THE**
7 **PROPOSED FACILITIES WILL CONFORM TO APPLICABLE STATE AND**
8 **LOCAL LAWS AND REGULATIONS?**

9 **A.** Yes. In the Application and testimony, the Company affirms it will conform to all
10 applicable state and local laws and regulations as they pertain to the proposed transmission
11 lines and associated facilities.

12 **Q. WERE ANY COMMENTS FILED IN THIS DOCKET PERTAINING TO THE**
13 **COMPANY'S REQUEST FOR A CERTIFICATE FOR THE TRANSMISSION**
14 **LINES?**

15 **A.** No.

16 **Q. HAS THE COMPANY SECURED THE NECESSARY RIGHTS-OF-WAY ALONG**
17 **THE TRANSMISSION LINE ROUTES?**

18 **A.** Yes. The Proposed Lines are to be built entirely within the Company's existing
19 ROW.

20 **Q. DOES ORS HAVE AN OBJECTION TO THE COMPANY'S REQUESTED LIKE**
21 **FACILITIES DETERMINATION?**

22 **A.** No. Pursuant to S.C. Code Ann. § 58-33-110(1) (2015), the Commission is vested
23 with the authority to make a "like facility" determination. Should the Commission

determine that the Company's request meets the criteria for a "like facility" determination, ORS has no objection to the Company's request.

Q. HOW WILL THIS PROJECT ALLOW THE COMPANY TO CONTINUE TO PROVIDE RELIABLE AND HIGH QUALITY UTILITY SERVICE IN SOUTH CAROLINA?

A. The construction of the Proposed Lines and associated facilities will enhance the reliability of the electrical system in growing areas of the Company's service territory and will provide for the safe and economical transfer of electricity to load centers. The result will be a reliable and high quality delivery of power.

Q. WILL PUBLIC CONVENIENCE AND NECESSITY BE SERVED BY THE TRANSMISSION LINES PROPOSED IN THE APPLICATION?

A. Yes. ORS's review concluded that the Proposed Lines and associated facilities will result in minimal impact to the environment and will serve the interests of system economy and reliability. The Proposed Lines and associated facilities will support the Company in providing reliable electric service to its customers in the Company's Southwest service territory.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.